REMARKS

Claims 1, 6, 9-13, 6-22, 25-27, 30-32, 35 and 36 have been amended. Independent claims 1, 11, 13, 22, 27 and 32 have been amended to clarify that the representation of each colour entity and/or relation indicators are presented to the user so as to assist the user to manage colour settings of multiple colour entities. These features were recited in original claim 1. Similar amendments have been made to dependent claims 6, 10, 12, 21, 25, 30 and 35. Claims 9 and 18 have been amended to clarify that the relation indicator is selected by the user. These amendments are for the purpose of clarification only. No new matter has been introduced into the application by these amendments.

Turning to the art rejection, the Examiner has rejected claims 1-36 under 35 U.S.C. 102(b), stating that these claims are anticipated by Swen et al (US Patent No. 5,806,081). Applicant respectfully requests reconsideration of the rejection for the reasons set out below.

(1) Claims 1 and 12

The Examiner has compared Swen's teaching with the elements of claims 1 and 12. Applicant respectfully requests reconsideration of these comparisons.

The present invention relates to a user interface to assist the user to manage colour settings of multiple colour entities. Claim 1 recites a colour management user interface controller that comprises a representation controller and relation indicator controller. The representation controller presents to a user representation of each colour entity, and the relation indicator controller presents to the user one or more relation indicators indicating colour relation between the colour entities repented by the representations. Thus, the user can manage colour settings of the colour entities using the presentations. Claim 12 also recites these elements.

By contrast, Swen does not teach any colour management user interface controller, directly or indirectly.

Swen teaches a method and system for embedding or extracting a device profile into or from a document in a colour management system. While Swen mentions a user interface in column 11, line 40, it refers to a single well defined action of modifying the header part in a colour profile (column 11, lines 39-41). This is not a representation controller or a relation indicator controller as recited in claim 1 of the present application.

The Examiner indicated that Swen discloses in column 3, line 64 to column 4, line 6 a colour management user interface controller for use in a colour management system for assisting users to manage colour settings of multiple colour entities. Swen discloses in this section utilities of Apple computer's ColorSync (TM). This does not relate to any user interface. The ColorSync utilities are defined from column 4, line 65 as a "set of routines and data structures that enable color processing system 24 to match colors and communicate color information between the various source and destination devices". There is no implication from Swen that ColorSync presents anything to a user in this communication. The term "communicate" correspond to interaction between different programming routines, and it is not between a user and a system. Thus, ColorSync is not a user interface controller, and Swen does not disclose any colour management user interface controller recited in claims 1 and 12.

The Examiner indicated that Swen's colour processing system disclosed in column 5, lines 10-30 corresponds to a representation controller for presenting representation of each colour entity. Swen's colour processing system has device profiles, and this section describes

various parts of the colour processing system. While Swen's colour processing system may include a user interface, Swen does not disclose or imply because Swen is directed to totally different matters. Thus, Swen's colour processing system is very different from the representation controller recited in claims 1 and 12.

The Examiner further indicated that Swen's components manager disclosed in column 5, lines 59-67 corresponds to a relation indicator controller for presenting one or more relation indicators indicating colour relation between the colour entities represented by the representations. Applicant has carefully reviewed the section to which the Examiner has referred. The phrase "an interface between components and clients" in Swen refers to a programming interface, rather than a user interface. The term "clients" is defined in column 5, lines 32-33 as applications and device drivers. These clients are not users. As it is stated in this section, "Component Manager 40 is used to locate and communicate with components of that class.", that is, the communication is between programming routines. There is no communication or presentation of relation indicators made to a user by Swen's component manager. Thus, Swen's component manager is different from the relation indicator controller recited in claims 1 and 12.

Therefore, it is clear that Swen does not disclose or suggest any colour management user interface or user interface controller. Applicant respectfully submits that claims 1 and 12 are patentably distinguished from Swen.

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

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(2) Claims 2, 14, 23, 28 and 33

The Examiner took the position that Swen teaches in column 6, lines 13-18 the subject matter of claims 2, 14, 23, 28 and 33. Applicants respectfully request reconsideration of this position.

As discussed above, Swen does not disclose or suggest any colour management system user interface controller. In column 6, lines 13-18 Swen discloses the fact that multiple clients (i.e. "application and drivers" as defined in column 5, line 31) can have a connection to a component (i.e. "piece of code that provides a defined set of services to one or more clients" as defined in column 5, line 33). It does not assist user in managing colour settings. In fact such communication between client and component is a communication between programming routines, and therefore hidden from the user. This leads away from the objected claims. There is no relation indicator controller present in the scheme of Swen that allows the user to manage color relation between color entities.

Accordingly, it is respectfully submitted that claims 2, 14, 23, 28 and 33 are patentably distinguished over Swen.

(3) Claims 3, 15, 24, 29 and 34

The Examiner has indicated that Swen teaches the subject matter of claims 3, 15, 24, 29 and 34. Applicant requests reconsideration of the rejection.

As discussed above (1) and (2), Swen does not disclose any colour management user interface, and Swen's Component manager 40 does not correspond to the relation indicator controller as recited in those claims. What Swen discloses in column 11 lines 54-60 is the algorithm for dynamically dispatching device profile data to achieve more efficient memory

utilization. Swen's "the ability to modify the device profile or its contents" is not the ability to allow the user to modify them. In Swen, the modification of the device profile or its contents is carried out automatically, and thus, there is no need to present indicators to the user.

Therefore, it is respectfully submitted that claims 3, 15, 24, 29 and 34 are patentably distinguished over Swen.

(4) Claims 4 and 16

The Examiner has indicated that Swen teaches the subject matter of claims 4 and 16. Applicant requests reconsideration of the rejection.

In column 6, lines 55-60, Swen describes the modular architecture of the colour management system. As indicated above, ColorSync utilities are not a user interface and do not correspond to the relation indicator controller. Figure 3 is a block diagram illustrating the modular architecture. This is not a presentation displayed by a user interface. Arrows shown in Figure 3 merely symbolically illustrating the communication between those modules. They are not arrow buttons presented to the user.

Accordingly, it is respectfully submitted that claims 4 and 16 are patentably distinguished over Swen.

(5) Claims 5 and 17

The Examiner has indicated that Swen teaches the subject matter of claims 5 and 17. Applicant requests reconsideration of the rejection.

In column 4, lines 62-67 Swen describes "a set of routines and data structures that enable color processing system 24 to match color". This section refers to the low level framework of

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

color management system that is actually hidden from the user. It does not refer to any user interface.

Accordingly, it is respectfully submitted that claims 5 and 17 are patentably distinguished over Swen.

(6) Claims 6 and 18

The Examiner has indicated that Swen teaches the subject matter of claims 6 and 18. Applicant requests reconsideration of the rejection.

Column 4 lines 62-67 is irrelevant to color matching data generation. Contrary, in this section Swen describes "a set of routines and data structures that enable color processing system 24 to match colors and communicate color information between the various source and destination devices". Swen does not disclose or imply any generation of colour matching data in the described process. All described by Swen is "communicating" and "transmitting" (column 5, line 2) of data that existed before as color profile. This is not "generated" by the color matching system.

Accordingly, it is respectfully submitted that claims 6 and 18 are patentably distinguished over Swen.

(7) Claims 7, 19, 25, 30 and 35

The Examiner has indicated that Swen teaches the subject matter of claims 7, 19, 25, 30 and 35. Applicant requests reconsideration of the rejection.

As discussed above, Swen does not disclose any particular user interface controller. In column 4, line 54-59, Swen discloses "a device driver associated with source device 26 or an application software program being used by a user to access the input document or image".

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

Swen uses the phrase "being used by a user" to refer to the software program that user launched to open some document or image. The word "associates" refers to the association of the device driver and source device, i.e. this word reflects the fact that device driver and actual device are related to each other. Thus, what Swen discloses does not correspond to the "function to associate the representation of each colour entity with a colour profile of the colour entity". The association by Swen happens between device driver and device, not between colour entity and color profile.

Therefore, it is respectfully submitted that claims 7, 19, 25, 30 and 35 are patentably distinguished over Swen.

(8) Claims 8 and 20

The Examiner has indicated that Swen teaches the subject matter of claims 8 and 20. Applicant requests reconsideration of the rejection.

As discussed above, Swen does not disclose any user interface controller. Claims 8 and 20 relate to the user interface controller that utilizes storage. While Swen refers to the color profile storage entity, this is not a storage that the user interface controller uses.

Accordingly, it is respectfully submitted that claims 8 and 20 are patentably distinguished over Swen.

(9) Claim 9

The Examiner has indicated that Swen teaches the subject matter of claim 9. Applicant requests reconsideration of the rejection.

HAYES SOLOWAY P.C.
130 W. CUSHING ST.
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

As discussed above, Swen does not disclose any user interface controller or representation controller. In column 4, lines 49-61 Swen does not disclose or imply any presentation of colour profile information to the user.

Accordingly, it is respectfully submitted that claim 9 is patentably distinguished over Swen.

(10) Claims 10, 21, 26, 31 and 36

The Examiner has indicated that Swen teaches the subject matter of claims 10, 21, 26, 31 and 36. Applicant requests reconsideration of the rejection.

As discussed above, Swen does not disclose any user interface controller. Swen does not disclose or suggest any user interface controller which presents representation of a colour entity in multi levels as claimed in these claims.

In column 8, lines 13-22 Swen merely describes the structure of the color profile (i.e. the logical layout of data structure). Swen does not disclose or imply presenting of the representation of color entities in multilevel. Presenting them in a certain manner is different from the structure of the profile. It is independent on the profile' structure.

Accordingly, it is respectfully submitted that claims 10, 21, 26, 31 and 36 are patentably distinguished over Swen.

(11) Claim 11

The Examiner has indicated that Swen teaches the subject matter of claim 11. Applicant requests reconsideration of the rejection.

Claim 11 recites a colour management system which comprises a user interface controller and a colour settings manager. The user interface controller presents to a user colour relation, and the colour settings manager controls colour relation setting, in accordance with colour relation setting input by the user. As such, the colour management system allows user interaction for colour management.

As discussed above, Swen does not disclose any user interface controller. Swen does not describe in column 4, line 46-55 that color relation setting input is performed by the user. The only role of the user in this sentence is to launch the application that opens document or image . In Swen, the user's participation is limited to merely requesting the color matching (column 4, line 62). There is no suggestion in Swen that it is a user who input the color relation settings. Contrary, it is clear from the context that in Swen it is interaction between different components of color management system, not the user and color management system, that sets such color relations. The same is true for column 6, lines 62-67. Swen does not disclose any interaction between the color management system and user.

Accordingly, it is respectfully submitted that claim 11 is patentably distinguished over Swen.

(12) Claims 13, 22, 27 and 32

The Examiner has indicated that Swen teaches the subject matter of claims 13, 22, 27 and 32. Applicant requests reconsideration of the rejection.

Swen does not disclose any presentation function or steps of the colour processing system. This is because Swen simply does not deal with the user interface. In column 5 lines 10-30, Swen discloses the relations in color processing system 24, but these relations are logical

and programming relations between components (i.e. routines and data structures), not between

the color entities.   In column 5, lines 59-67, Swen describes a programming interface. Swen
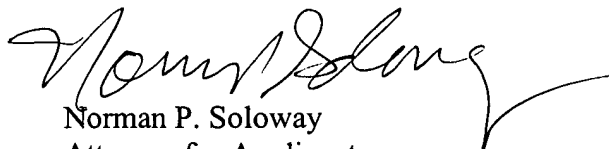
does not disclose nay user interaction.

Accordingly, Applicant trusts that the present invention as claimed in claims 13, 22, 27

and 32 is patentably distinguished over Swen.

Consequently, it is respectfully submitted that all claims patentable over Swen.

Reconsideration of the application is respectfully requested.

Having dealt with all the objections raised by the Examiner, the Application is believed

to be in order for allowance. Early and favorable action are respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge

them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,

Norman P. Soloway
Attorney for Applicant
Reg. No. 24,315

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